

BRANDON P. JOHANSSON, ESQ.
Nevada Bar No. 12003
ARMSTRONG TEASDALE LLP
3770 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
Telephone: 702.678.5070
Facsimile: 702.878.9995
bjohansson@atllp.com

*Attorneys for Sovereign Business Solutions, LLC
and L. Steven Haynes*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SOVEREIGN BUSINESS SOLUTIONS, LLC,
and L. STEVEN HAYNES,

Plaintiffs,

vs.

PLAIN GREEN, LLC,

Defendant.

Case No.: 2:21-cv-00404-RFB-EJY

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE
FOR PLAINTIFFS TO FILE
RESPONSE TO DEFENDANT'S
MOTION TO DISMISS FOR LACK
OF SUBJECT MATTER
JURISDICTION**

[FIRST REQUEST]

Plaintiffs Sovereign Business Solutions, LLC ("SBS") and L. Steven Haynes ("Mr. Haynes," and together with SBS, the "Plaintiffs"), and Defendant Plain Green, LLC ("Defendant"), by and through their undersigned counsel, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline for Plaintiffs to file their response to Defendant's Motion to Dismiss for Lack of Subject Matter Jurisdiction (ECF No. 15) from April 15, 2021, to April 29, 2021. This is the first request to extend this particular deadline.

On April 1, 2021, Defendant filed its Motion to Dismiss for Lack of Subject Matter Jurisdiction ("Motion to Dismiss"). (ECF No. 15.) The Plaintiffs' response brief is currently due on April 15, 2021. As a result of the issues raised in the Motion to Dismiss, Plaintiffs need additional time to fully evaluate and prepare their response. Defendant does not oppose providing this additional time. This request is made in good faith and is not intended to unreasonably delay this matter.

Based on the foregoing, the parties respectfully request that this Court extend Plaintiffs' deadline to file their response to the Motion to Dismiss from April 15, 2021 to April 29, 2021.

DATED this 7th day of April, 2021.

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ARMSTRONG TEASDALE LLP

SNELL & WILMER LLP

By: /s/Brandon P. Johansson
BRANDON P. JOHANSSON, NV Bar 12003
3770 Howard Hughes Parkway Suite 200
Las Vegas, Nevada 89169

*Attorneys for Sovereign Business Solutions, LLC
and L. Steven Haynes*

By: /s/Kelly H. Dove
KELLY H. DOVE, NV Bar 10569
GIL KAHN, NV Bar 14220
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, Nevada 89169

Attorneys for Plain Green, LLC

ORDER

IT IS SO ORDERED.


RICHARD E. BOULWARE, II
United States District Court

DATED this 8th day of April, 2021.